

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

2311 RACING LLC d/b/a 23XI RACING and
FRONT ROW MOTORSPORTS, INC.,

Movants,

v.

NATIONAL BASKETBALL ASSOCIATION,
NATIONAL FOOTBALL LEAGUE, and NHL
ENTERPRISES, L.P.

Respondents.

Case No. 1:25-mc-146

Underlying Litigation

*2311 Racing LLC, et al. v. Nat'l Ass'n for
Stock Car Auto Racing, LLC, et al.*, No.
3:24-cv-886-KDB-SCR in the United
States District Court, Western District of
North Carolina Charlotte Division

**NOTICE OF MOVANTS' MOTION
TO COMPEL COMPLIANCE WITH
SUBPOENAS ISSUED TO THE
NATIONAL BASKETBALL
ASSOCIATION, NATIONAL
FOOTBALL LEAGUE, and NHL
ENTERPRISES, L.P.**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE THAT, pursuant to Federal Rule of Civil Procedure 45, on a date and at a time to be determined by this Court, located in 500 Pearl Street, New York, New York 10007, Movants 2311 Racing LLC d/b/a 23XI Racing and Front Row Motorsports, Inc. (collectively, "Movants"), shall and hereby do move the Court for an order compelling third parties the National Basketball Association, National Football League, and NHL Enterprises, L.P. to produce documents responsive to Movant's subpoena in *2311 Racing LLC, et al. v. National Association for Stock Car Auto Racing, LLC, et al.*, No. 3:24-cv-886-KDB-SCR (W.D.N.C.). The motion is based on this Notice of Motion; the accompanying Memorandum of Law in Support of the Motion; the Declaration of Jeanifer E. Parsigian ("Parsigian Decl.") filed concurrently with this Motion and the exhibits thereto; all other pleadings and papers on file in this action; all further

argument or authorities as the Court may request or permit; and all matters presented at the hearing on this motion.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 6.l(b) of the United States District Court for the Southern District of New York, any opposing affidavits and answering memoranda of law shall be served within fourteen days after service of the moving papers, and any reply affidavits and reply memoranda of law shall be served within seven days after service of the answering papers.

Dated: March 31, 2025

Respectfully submitted,

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